

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NETWORK DATA ROOMS, LLC,

X

Civil Case No.: 22-CV-2299-LGS

Plaintiff,

-v-

SAULREALISM LLC and RYAN SAUL, in her individual
and professional capacities,

Defendants.

X

**ORDER TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION AND
AND TEMPORARY RESTRAINING ORDER**

On *Ex Parte* Application (“Application”) of Plaintiff NETWORK DATA ROOMS, LLC (“Plaintiff”), upon hearing oral argument from Plaintiff’s counsel on March 24, 2022, and reading the Verified Complaint dated March 21, 2022, the annexed Certification of Nicholas Fortuna dated March 22, 2022, the annexed Declaration of Christopher Concannon dated March 22, 2022 and exhibits thereto, the annexed Declaration of David Delorge dated March 22, 2022 and exhibits thereto, and the Accompanying Memorandum of Law,

LET the above-named Defendants, SAULREALISM LLC and RYAN SAUL (“Defendants”), or their attorneys show cause on **April 7, 2022, at 10:00 a.m., on the following conference line: 888-363-4749, access code: 558-3333**, why an Order pursuant to Rule 65 of the Federal Rules of Civil Procedure, pending a final disposition of this action, should not be made and entered:

(a) Enjoining Defendants, and their agents, representatives, employees or anyone else acting on their behalf or in concert with them from destroying, disclosing, transferring, or

in any way using any of Plaintiff's confidential, proprietary, and trade secret information including but not limited to, the codebase of the DealTable Virtual Data Room Platform software, and the decompiled source code written by Defendants between September 26, 2021 and January 18, 2022;

(b) Directing Defendants to turn over to Plaintiff the original and all copies of the codebase of the DealTable Virtual Data Room Platform software and the decompiled source code written by Defendants between September 26, 2021 and January 18, 2022, in their possession, custody, or control; and

(c) Granting such other and further relief as this Court may deem proper;

AND sufficient cause having been shown, it is hereby further

ORDERED that pursuant to Rule 65 (b) of the Federal Rules of Civil Procedure, pending the hearing and determination of Plaintiff's application for a preliminary injunction, the Defendants and their agents, representatives, employees or anyone else acting on their behalf or in concert with them, are temporarily restrained and enjoined from destroying, disclosing, transferring, or in any way using any of Plaintiff's confidential, proprietary, and trade secret information including but not limited to, the codebase of the DealTable Virtual Data Room Platform software, and the decompiled source code written by Defendants between September 26, 2021 and January 18, 2022; it is further

ORDERED that bond in the amount of \$ 5,000.00 be posted by the Plaintiff by **March 31, 2022**; it is further

ORDERED that service of a copy of this Order to Show Cause, together with the papers upon which it is based, be made by personal or overnight delivery service, and by email if possible, upon Defendants or their counsel on or before **March 25, 2022**, shall be deemed good and

sufficient service thereof; it is further

ORDERED that by **March 25, 2022**, Plaintiff shall file proof of such service; it is further

ORDERED, that Defendants' answering papers, if any, shall be served upon Plaintiff's attorneys by filing on CM/ECF on or before **March 31, 2022**; it is further

ORDERED, that reply papers, if any, are to be served upon Defendants or Defendants' attorney by filing on CM/ECF on or before **April 5, 2022**.


The parties are directed to the Court's Individual Rules regarding page limits.

This temporary restraining order shall expire when a hearing is held or upon order of the court, whichever is earlier.

The Clerk of Court is respectfully directed to close the motion at Docket No. 9.

Dated: March 24, 2022

New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE